

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**25-20229-CR-RUIZ/LOUIS**  
CASE NO. \_\_\_\_\_

18 U.S.C. § 1349  
18 U.S.C. § 1343  
18 U.S.C. § 1957(a)  
18 U.S.C. § 981(a)(1)(C)  
18 U.S.C. § 982(a)(1)

UNITED STATES OF AMERICA

v.

\_\_\_\_\_  
GREGORI ARZUMANOV,  
a/k/a "Grigori Arzoumanov,"

Defendants.

/

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. Condominium Association 1 was a not-for-profit corporation incorporated in the State of Florida located in Miami-Dade County.
2. IX Financial Center LLC ("IX Financial") was a South Dakota limited liability company whose registered agent was \_\_\_\_\_
3. Bank 1 was a financial institution headquartered in New York, New York, with branches located in the State of Florida.
4. Bank 2 was a financial institution headquartered in Charlotte, North Carolina, with branches located in the State of Florida.

[REDACTED]

6. Defendant, **GREGORI ARZUMANOV**, a/k/a "Grigori Arzoumanov," was a board member of Condominium Association 1 who owed a fiduciary duty to Condominium Association 1 under Florida law.

**COUNT 1**  
**Conspiracy to Commit Wire Fraud**  
**(18 U.S.C. § 1349)**

1. The General Allegations section of this Indictment is re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around April 2024, and continuing through in or around December 2024, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

[REDACTED]  
**GREGORI ARZUMANOV,**  
**a/k/a "Grigori Arzoumanov,"**

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate and agree with each other, and with others known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly, and with intent to defraud, devise and intend to devise and execute a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and, for the purpose of executing such scheme and artifice to defraud, did knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce,

certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

**PURPOSE OF THE CONSPIRACY**

3. It was the purpose of the conspiracy for [REDACTED] [REDACTED] GREGORI ARZUMANOV, a/k/a "Grigori Arzoumanov," to unlawfully enrich themselves and others by falsely and fraudulently transferring and withdrawing funds from Condominium Association 1's bank account at Bank 1 for their own use and benefit.

**MANNER AND MEANS OF THE CONSPIRACY**

The manner and means by which the defendants sought to accomplish the purpose of the conspiracy included, among other things, the following:

4. [REDACTED] GREGORI ARZUMANOV, a/k/a "Grigori Arzoumanov," withdrew, including by wire transfer and by check, funds from Condominium Association 1's account at Bank 1 and deposited the funds into bank accounts controlled by [REDACTED]

5. As to the check from Bank 1, [REDACTED] opened a business account with Bank 2 in the name of Condominium Association 1 and falsely and fraudulently deposited the check in the amount of \$116,251.27 into the Bank 2 account.

6. [REDACTED] GREGORI ARZUMANOV, a/k/a "Grigori Arzoumanov," used the fraudulent proceeds falsely and fraudulently obtained from Condominium Association 1's bank account for their own personal benefit.

All in violation of Title 18, United States Code, Section 1349.

**COUNTS 2-3**  
**Wire Fraud**  
**(18 U.S.C. § 1343)**

1. The General Allegations section of this Indictment is re-alleged and incorporated by reference as though fully set forth herein.

2. On or about the dates specified below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

[REDACTED]  
[REDACTED] **GREGORI ARZUMANOV,**  
**a/k/a "Grigori Arzoumanov,"**

did knowingly, and with intent to defraud, devise, and intend to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and, for the purpose of executing such scheme and artifice to defraud, did knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, certain writings, signs, signals, pictures, and sounds.

**PURPOSE OF THE SCHEME AND ARTIFICE**

3. It was the purpose of the scheme and artifice for [REDACTED]  
[REDACTED] **GREGORI ARZUMANOV, a/k/a "Grigori Arzoumanov,"** to unlawfully enrich themselves and others by, among other things, falsely and fraudulently transferring and withdrawing funds from Bank 1 for their own use and benefit.

**MANNER AND MEANS OF THE SCHEME AND ARTIFICE**

4. Paragraphs 4 through 6 of the Manner and Means from Count 1 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein as the description of the scheme and artifice.

USE OF WIRES

5. On or about the dates specified as to each count below, [REDACTED] [REDACTED] [REDACTED] GREGORI ARZUMANOV, a/k/a "Grigori Arzoumanov," for the purpose of executing the aforesaid scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, did knowingly transmit and cause to be transmitted by means of wire communication, in interstate commerce, certain writings, signs, signals, pictures, and sounds, as described below:

COUNT	APPROX. DATE	DESCRIPTION OF WIRE
2	May 20, 2024	Wire transfer in the amount of \$610,000.00 from Condominium Association 1's account at Bank 1 to IX Financial's account at Bank 2 in the Southern District of Florida.
3	July 5, 2024	Deposit of check in the amount of \$116,251.27 from Condominium Association 1's account at Bank 1 to a bank account in the name of Condominium Association 1 at Bank 2 in the Southern District of Florida.

In violation of Title 18, United States Code, Sections 1343 and 2.



**FORFEITURE ALLEGATIONS**

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendants, [REDACTED] **GREGORI ARZUMANOV, a/k/a "Grigori Arzoumanov,"** have an interest.

2. Upon conviction of violations of Title 18, United States Code, Sections 1343 and 1349, as alleged in this Indictment, the defendants shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such violation, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

[REDACTED]

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON



HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY



ILANA MALKIN  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: \_\_\_\_\_

v.

████████████████████  
 ███ GREGORI ARZUMANOV a/k/a "Grigori  
 Arzoumanov," /

Defendants.

Court Division (select one)

☒ Miami      ☐ Key West      ☐ FTP  
☐ FTL      ☐ WPB

## CERTIFICATE OF TRIAL ATTORNEY

## Superseding Case Information:

New Defendant(s) (Yes or No) \_\_\_\_\_

Number of New Defendants \_\_\_\_\_

Total number of new counts \_\_\_\_\_

I do hereby certify that:

1. I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.

3. Interpreter: (Yes or No) No

List language and/or dialect: \_\_\_\_\_

4. This case will take 3 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)

I ☒ 0 to 5 daysII ☐ 6 to 10 daysIII ☐ 11 to 20 daysIV ☐ 21 to 60 daysV ☐ 61 days and over

(Check only one)

☐ Petty☐ Minor☐ Misdemeanor☒ Felony

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_

7. Has a complaint been filed in this matter? (Yes or No) Yes

If yes, Judge Lisette M. Reid Magistrate Case No. 24-MJ-04543

8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No

If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_

9. Defendant(s) in federal custody as of \_\_\_\_\_

10. Defendant(s) in state custody as of \_\_\_\_\_

11. Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_

12. Is this a potential death penalty case? (Yes or No) No

13. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No

14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By: \_\_\_\_\_



Ilana Malkin

Assistant United States Attorney

SDFL Court ID No. A5503170



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** GREGORI ARZUMANOV a/k/a "Grigori Arzoumanov"

**Case No:**

**Count #:** 1

Conspiracy to Commit Wire Fraud

Title 18, United States Code, Section 1349

\* **Max. Term of Imprisonment:** 20 years

\* **Mandatory Min. Term of Imprisonment (if applicable):** None

\* **Max. Supervised Release:** 3 years

\* **Max. Fine:** The Greater of \$250,000 or Twice the Gross Loss/Gain

**Counts #:** 2-3

Wire Fraud

Title 18, United States Code, Section 1343

\* **Max. Term of Imprisonment:** 20 years

\* **Mandatory Min. Term of Imprisonment (if applicable):** None

\* **Max. Supervised Release:** 3 years

\* **Max. Fine:** The Greater of \$250,000 or Twice the Gross Loss/Gain

\*Refers only to possible term of incarceration, supervised release, and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.